

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

In RE: Andrea Marie Shaul
Robert Blain Shaul, Debtors

Chapter 7, No. 4:18-bk-04779

Andrea Marie Shaul, Plaintiff

Adversary Proceeding
4:19-ap-00054

Vs.

Navient and
EdFinancial Services, Defendants

APPLICATION TO EMPLOY ATTORNEY

TO THE HONORABLE ROBERT N. OPEL, BANKRUPTCY JUDGE:

The application of Andrea Shaul and Robert Shaul respectfully represents:

1. On the 31st day of August 2018, applicant was hired to represent Andrea Marie Shaul and Robert Blaine Shaul in a Chapter 13 bankruptcy action.
2. On the 9th of December 2018, applicant was hired to file an adversary action on behalf of Andrea Shaul as listed in the docket above.
3. On the 21st of August, 2019, this case was converted from a Chapter 13 to a Chapter 7 bankruptcy.
4. The professional services that Matthew J. Zeigler, Esquire, is to render are, among others, the following:
 - (a) to handle any and all legal problems which may arise during the course of the adversary proceeding.
4. The proposed billing rate for the attorney for the debtors will be \$200.00 an hour plus costs for services rendered during calendar years 2019 and 2020.

5. To the best of applicants' knowledge, Matthew J. Zeigler, Esquire, has no connection with the creditors, or any other party in interest, and represents no interest adverse to the debtors upon which he is to be engaged, and his employment would be in the best interest of the debtors.

WHEREFORE, applicants pray that they be authorized to employ Matthew J. Zeigler, Esquire, as their attorney under a general retainer.

Respectfully submitted,

/s/ Matthew J. Zeigler

Matthew J. Zeigler, ID # 83367

Attorney for Plaintiff

Zeigler & Associates

353 Pine Street, Suite 3

Williamsport, PA 17701

570-599-2211, Fax: 570-599-2209

mjzeigler@comcast.net

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AFFIDAVIT OF PROPOSED ATTORNEY

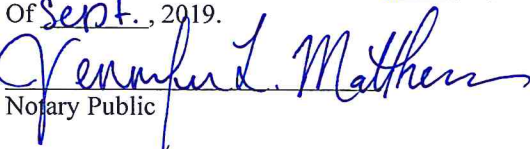
COMMONWEALTH OF PENNSYLVANIA :
: SS
COUNTY OF LYCOMING :

I, Matthew J. Zeigler, Esquire, hereby make solemn oath:

1. I am an attorney and counselor-at-law duly admitted to practice in the Commonwealth of Pennsylvania, and the United State Bankruptcy Court for the Middle District of Pennsylvania.
2. I maintain an office for the practice of law at Zeigler & Associates, LLC, 353 Pine Street, Suite 3, Williamsport, PA 17701.
3. I have no connection with the Defendants, creditors for the Plaintiffs or any party in interest herein, or his respective attorneys.
4. I represent no interest adverse to the Debtor in the matters upon which I am to be engages.
5. I am a disinterested person within Section 101(14) of the Bankruptcy Code.

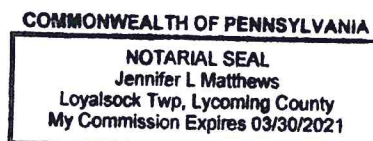

Matthew J. Zeigler, Esquire

Sworn to and subscribed to me this 23rd day
Of Sept., 2019.


Notary Public

My commission expires:

3/30/21



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CERTIFICATE OF SERVICE

I, **Christine G. Zeigler**, paralegal for Attorney Matthew J. Zeigler, attorney for Andrea and Robert Shaul, Debtors, and Andrea Shaul, Plaintiff, do certify that I served a true and correct copy of the foregoing **APPLICATION** by depositing a true and correct copy of the same in the United States Mail at Williamsport, Pennsylvania, postage prepaid, first class mail, on September 23, 2019, addressed to the following:

Edfinancial Services
New York State Higher Education Services Corp
99 Washington Avenue
Albany, NY 12214

Edfinancial Services
Massachusetts Education Assistance Corp d/b/a
American Student Assistance
PO Box 16129
St. Paul, MN 55116

Navient Solutions LLC
GLHEC and Affiliates
PO Box 8961
Madison, WI 53708-8961

Navient Solutions LLC
Educational Credit Management Corporation
Lockbox 8682
St. Paul, MN 55116-8682

Respectfully Submitted:
ZEIGLER & ASSOCIATES LLC
Attorney for Debtors

s/Christine G. Zeigler
Christine G. Zeigler, paralegal
For Attorney Matthew J. Zeigler,
Attorney ID: 83367
353 Pine Street, Suite 3
Williamsport, PA 17701
(570) 599-2211,
mjzeigler@comcast.net

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ORDER

Upon consideration of the annexed application of Matthew J. Zeigler in the above matter, praying for authority to employ and appoint Matthew J. Zeigler, Esquire, under a general retainer to represent as an attorney for the debtors, no adverse interest having been represented, and it further appearing the Matthew J. Zeigler, Esquire, is an attorney duly admitted to practice in this court, and the court being satisfied that Matthew J. Zeigler, Esquire, represents no adverse interest as an attorney for the Debtors in the matters upon which he is to be engaged, that his employment is necessary and would be in the best interest of the Debtors, and that the case is one justifying the employment of an attorney under a general retainer, it is

HEREBY ORDERED AND DECREED that the said Matthew J. Zeigler, is hereby authorized to employ the said Matthew J. Zeigler, Esquire, as attorney under a general retainer.